

Federal Communication Commission
Secretary, Room 222
1919 M. Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: RM - 9267

Dear Commission:

As a licensed Amateur Radio Operator, I would like to go on record as being strongly opposed to the petition under consideration, RM-9267.

I am active on many Amateur Radio frequencies that promote public welfare through emergency, disaster and public service communication. The frequencies stated in RM-9267 (420 MHz to 430 MHz and 440 MHz to 450 MHz), are very important to our continued success in serving the public and our communities through our work. These frequency segments also include important linking, control, and repeater systems that are used daily in our area.

One of the five reasons that our Government created the Amateur Radio Service was to have a readily available pool of trained operators to assist with emergency communications when the unexpected occurs. While Amateur Radio is allocated as the secondary user of these frequencies, our emergency networks have caused little interference to the primary user, the United States Government. RM-9267 contains no technical solutions that prove Amateur Radio operators could continue to use these bands for emergency preparations and operations if land mobile communications became the primary user. In Southern California, this relatively small portion of Spectrum will quickly fill up with bases, mobiles, and repeaters assigned to businesses, leaving amateurs and their established emergency communication networks ineffective with the inevitable increase in business traffic under RM-9267.

Please consider fully the consequences of RM-9267 and assigning primary frequency usage to Land Mobile Radio. As a member of the Amateur Radio Community, I want to continue to serve my National, State, and Local Governments by providing my equipment and services during an emergency. RM-9267 will limit the amateur radio operator's access to these frequencies and will definitely interfere with all amateur disaster preparation communication efforts.

Sincerely,

Mort Arditti

MORT ARDITTI KB6BSN
3625 LANKERSHIM BLVD
LOS ANGELES, CA 90068

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ABODE 060T

Mordechai Arditti
S/S 548-54-9116
3625 Lankershim Blvd.
Los Angeles, Ca. 90068

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MAY 20 1998
FEDERAL COMMUNICATIONS COMMISSION

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COMMENT ON RM-9267 5/19/98

From Donald E Farwell (W6GYD) 18724 Martha Ave Saratoga, CA 95070 5/19/98

To the Federal Communication Commission Room 222, 1919 M Street NW, Washington, DC 20554.

Sirs: The loss of 430-430 and 440-450 would be a very bad thing for me. I use the FM sub band (440-450) everyday for regain wide communications about my activities on the different ham bands. I also belong to a civil emergency group that uses this segment for it's emergency communications. It would be very unfortunate to remove the hams from this sub band as they have been very responsible stewards of the privileges granted here.

I also am a weak signal experimenter in the 420-430 mhz sub band and any occupation by a commercial group such as the LMCC organization would be a disaster to the amateur community and it's continuing use of this UHF band. Many manufactures of ham equipment would also be effected by any changes in these sub-bands.

Although the cold war is over the US still has it's enemies and need to reserve these shared bands for such emergencies as might arise.

At one time the FCC admitted to the ownership and protected the public's right to the airwaves. Now it seems that politicians are trying to sell these rights to any one who will put money in the government coffers. I object to this policy and have said so to my congressmen.

Sincerely Donald E Farwell (W6GYD)

Donald E Farwell

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Kaye Downs
Amateur Radio Station WA6USB
3615 Fairesta Street
La Crescenta, California 91214-1718

Federal Communications Commission
Secretary, Room 222
1919 M Street, N.W.
Washington DC 20554

Reference: RM-9267

May 19, 1998

Dear Commission:

As a licensed Amateur Radio Operator, I would like to go on record as being strongly opposed to the petition under consideration, RM-9267.

I am active on many Amateur Radio frequencies that promote public welfare through emergency, disaster and public service communication. The frequencies stated in RM-9267, 420 MHz to 430 MHz and 440 MHz to 450 MHz, are very important to our continued success in serving the public and our communities through our work. These frequency segments also include important linking, control, and repeater systems that are used daily in our area.

One of the five reasons that our Government created the Amateur Radio Service was to have a readily available pool of trained operators to assist with emergency communications when the unexpected occurs. While Amateur Radio is allocated as the secondary user of these frequencies, our emergency networks have caused little interference to the primary user, the United States Government. RM-9267 contains no technical solutions that prove Amateur Radio operators could continue to use these bands for emergency preparations and operations if land mobile communications became the primary user.

In Southern California, this relatively small portion of the spectrum will quickly fill up with base stations, mobiles and repeaters assigned to business, leaving amateurs and their established emergency communications networks ineffective with the inevitable increase in business traffic under RM-9267.

Please consider fully the consequences of RM-9267 and assigning primary frequency usage to Land Mobile Radio. As a member of the Amateur Radio community, I want to continue to serve my National, State and Local Governments by providing my equipment and services during an emergency. RM-9267 will limit the amateur radio operator's access to these frequencies and will definitely interfere with all Amateur Radio disaster preparation communications efforts.

Sincerely,



Kaye Downs
WA6USB

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Federal Communication Commission
Secretary, Room 222
1919 M. Street, N.W.
Washington, D.C. 20554

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Re: **RM - 9267**

MAY 28 1999

Dear Commission:

MAY 28 1999

As a licensed Amateur Radio Operator, I would like to go on record as being strongly opposed to the petition under consideration, RM-9267.

I am active on many Amateur Radio frequencies that promote public welfare through emergency, disaster and public service communication. The frequencies stated in RM-9267 (420 MHz to 430 MHz and 440 MHz to 450 MHz), are very important to our continued success in serving the public and our communities through our work. These frequency segments also include important linking, control, and repeater systems that are used daily in our area.

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Please consider fully the consequences of RM-9267 and assigning primary frequency usage to Land Mobile Radio. As a member of the Amateur Radio Community, I want to continue to serve my National, State, and Local Governments by providing my equipment and services during an emergency. RM-9267 will limit the amateur radio operator's access to these frequencies and will definitely interfere with all amateur disaster preparation communication efforts.

Sincerely,

NF6 DAE

Lou Rahourdis

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ABCD E

DET

KE6LHZ

RICHARD

16 May, 1998 MAY 28 1998

RE: RM 9257, G MALE ROOM

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Sirs;

HAM Radio Station KE6LHZ operates primarily on the 430 to 450 MHz Band allocated to HAM Radio Operators.

The Land Mobile Communications Council cannot assume control of this Amature Radio Band.

I also see a situation where Equipment Manufacturers may be encouraging this somewhat stealthy attempt to acquire this Amature Radio Band for the purpose of generating a **significant windfall profit** from the sale of Communications Equipment already in production and proven effective by Amature Radio use.

No on RM9267.

Darien A Fisher

Darien N. Fisher, KE6LHZ

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RE: RM9267

MAY 28 1998

May 15, 1998

FEDERAL COMMUNICATIONS COMMISSION

DOCKET FILE COPY ORIGINAL

To: Federal Communications Commission
Secretary, Room 222
1919 M Street N.W.
Washington, D.C. 20554

From: Bruce Murray
10965 Fruitland Dr #207
Studio City CA 91604

Dear Commission:

I would like to go on the record as being strongly opposed to the petition under consideration, RM-9267.

I am active with many Amateur Disaster Communication issues that promote public welfare through emergency, disaster and public service communication. The frequencies stated in RM-9267 (420 MHz to 430 MHz and 440 MHz to 450 MHz), are very important to our continued success in serving the public and our communities through our work. These frequency segments also include important linking, control, and repeater systems that are used daily in our area.

One of the five reasons that our Government created the Amateur Radio Service was to have a readily available pool of trained operators to assist with emergency communications when the unexpected occurs. While Amateur Radio is allocated as the secondary user of these frequencies, our emergency networks have caused little interference to the primary user, the United States Government. RM-9267 contains no technical solutions that prove Amateur Radio operators could continue to use these bands for emergency preparations and operations if Land Mobile Radio became the primary user. In Southern California, this relatively small portion of Spectrum will quickly fill up with bases, mobiles and repeaters assigned to businesses, leaving Amateurs and their established communications ineffective with the inevitable increase in business traffic under RM-9267.

Please consider fully the consequences of RM-9267 and assigning primary frequency usage to Land Mobile Radio. As a member of the Amateur Radio Community, I want to continue to serve my National, State and Local Governments by providing my equipment and service during an emergency. RM-9267 will limit the Amateur Radio Operator's access to these frequencies and will definitely interfere with all Amateur Disaster Communication efforts.

Sincerely,



Bruce C. Murray

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RM-9267

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May 15, 1998

MAY 28 1998

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Raymond Wolfe K9RI
4929-39th Ave
Kenosha, WI 53144-2104

I am writing this letter in opposition to the rule making RM-9267 by the Land Radio Mobile Service. I have been a ham for 25 years now and the Amateur Radio Emergency Coordinator for Kenosha County for 22 of those 25 years. If we loose the bands that is proposed we will loose a great deal of our ability to serve the community for weather spotting, parade's, bicycle rides, operation Santa Clause, etc. This ability will be lost because we have 3 links on the repeater we use for the services we provide. They happen to be on the 440 band. I also own a 220mhz Repeater and have been trying to get a frequency for a link on my repeater. Wisconsin Association of Repeaters has told me that there are no frequencies available for links below 900Mhz. I believe that if you allow this to happen that amateur radio will be greatly affected not only for hams but also for the public that we serve.

Thank You Very Much

Raymond H Wolfe

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5-27-98

Federal Communications Commission
1919 M St. NW
Washington, D.C. 20554
Secretary
Ref: RM-9267

Comments regarding "Petition RM-9267"

This petition contains many false assertions and claims.

1. The relocation of 420-430 and 440-450 from the Federal Government

occurring with PMRS having the primary basis and Amateur Radio existing on a secondary basis.

The reason the current sharing works (Federal Government and Amateur) is simply duty cycle or density. If LMCC (PMRS) really believes the restructuring with Amateur radio having a secondary basis is feasible, then the opposite should hold true. For example, PMRS having secondary basis and Amateur having primary.

The absence of even a hint of how a sharing arrangement would be implemented leaves one immediately suspect. Its abit like the promises of CTIA in regards to security of calls being available soon while knowing full well the technology existed but repeatedly missed deadlines, added delays and continued to build infrastructures to save monies and obtain cash flows. Of course, who pays in the long run for the redo of these networks is the consumer.

2. The petition suggest that equipment availability and technology resulting from the approval and implementation of such a plan would benefit the Amateur. This is an oddity considering the actual pioneering work in VHF and UHF was the direct result of the Amateur community.

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Two Meters is a very crowded band thus much of the repeater needs, emergency communications. etc. have been expanding to UHF.

3. An interesting scenario is currently in Richardson Texas. Here we have every Amateur Radio Club of each resident Telecom corporation participating in emergency communications for each perimeter city government as backup and for storm warnings. The bands incorporated are VHF, UHF and including 1.2 Ghz. Incidentally these same Amateurs because of their expertise and skillsets are part of the team bringing technology advances to the general public.
4. It seems a bit odd as well that such a group would have the opportunity to grab spectrum while others have been required to participate in auctions.

Walter Evanyk (W8KSW)
3200 Sherrye Dr.
Plano, Texas 75074-4693

May 27, 1998

DOCKET FILE COPY ORIGINAL

Office of the Secretary, Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RE: RM-9267 comments

I have been an active Amateur Radio operator for nearly ten years. Along with others, I own and operate a 440 MHz Amateur Radio repeater system with links to multiple sites and bands.

I also work in the Amateur Radio industry.

The loss of part or parts the 420 ~ 450 MHz this would have a major impact on me and those I serve.

As an Amateur Radio operator in Southern California, I have invested many thousands of dollars in radio equipment for use by others, particularly in times of emergency, which are all too frequent in this area. The system is donated for use to the City of Burbank when they have a need for emergency communications or drills. Others also use the repeater for day-to-day communications.

In addition to the above, I also enjoy SSB, ATV, and Satellite communication modes which are primarily executed on the 420 ~ 450 MHz band.

Professionally, I take great pride in saying that I sell radios. I have sold many thousands of them. The 440 band represents almost a quarter of the market and dual band (2 meter + 440 Radios) are nearly half of the VHF/UHF market. I sell the most popular 440 Hand-held Radio on the market. Reallocation of the band would cripple the business my firm has worked so hard to establish.

I have sold both commercial band and Amateur Radio equipment in the 11 years that I have been in the business. In Southern California, much of the business band has been replaced by NEXTEL. Therefore, there is no other reason to have any other type of systems other than integrated trunking, as it uses spectrum more efficiently. This is one of the reasons, I am no longer in Two-Way Radio Business.

We endured the last attack on Amateur Radio when we lost the bottom 2 MHz of the 220 ~ 225 MHz Band. This was a big business attempt to steal radio spectrum. Upon having the request approved, they never used it due to the politics and bad press they received from the reallocation process. Then the Commission decided to auction it off for business band use, but use ACSB for the emission mode (most people do not relate well to this type of emission as they prefer FM instead). The FCC ignored Amateur Radio and operators were forced to vacate the bottom 2 MHz, which is largely in disuse today. In California most of the Repeater Links were located on the 220 MHz band, links that could cover the state and local regions. This displacement pushed the repeater owners up to the 420~440 MHz band for links and auxiliary control points. This was done and we lived with it.

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If the request for reallocation is approved, this time we can not even begin to replace the spectrum if we lose the 420 ~ 430 MHz Band and the 440 ~ 450 MHz band. Southern California is the largest area in the nation for repeater use. All of the bands are FULL NOW.

To take spectrum from people that use it for Public Safety, Health and Welfare traffic in the event of disasters and other emergencies would be a crime.



Doug Wynn, KB6YZD
18075 Ventura Blvd. #515
Encino, CA 91316

Before the
FEDERAL COMMUNICATIONS COMMISSION

DOCKET FILE COPY ORIGINAL

Washington, D.C. 20554

In the Matter of)
)
An Allocation of Spectrum for)
Private Mobile Radio Services) RM-9267
)

To: The Secretary,
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government..

The 420-450 MHz Amateur allocation is so heavily used that when an amateur operator refers simply to a "dual-band" radio, it is certain that the 420-450 MHz range is one of the two bands. In the Seattle area where I live, all available frequency slots for UHF repeaters in the amateur service allocation are full.

The 420-450 MHz range (also referred to as the 70 cm band) offers a number of unique services to disaster relief efforts. Amateur television (ATV) has been used to provide emergency managers with on-demand, live imagery of disaster scenes. The 70 cm band is used to link repeaters and provide wide area coverage during emergencies. For example, efforts to fight the recent fires in the Mount Rainier, WA area were coordinated using a linked amateur repeater near Seattle.

The LMCC proposal lacks an explanation of how spectrum sharing is to be accomplished, or historical examples in which land mobile and Amateur Service operations have proven compatible. Without such documentation, there can be no assurance that the proposed reallocation will not prevent the amateur service from fulfilling its part 97 obligations. The history of commercial services using amateur spectrum has not been a happy one.

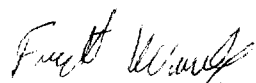
The LMCC is to be commended for raising the issue of whether there is a continued Federal need for the 420-450MHz allocation. The Amateur Service took on secondary status in this band to support Cold War national security needs for radiolocation. Unless there is a continued defense requirement, I

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respectfully request that the Commission restore the Amateur service's pre-Cold War status in the 420-450MHz UHF band.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frederick Wamsley".

Frederick Wamsley, KC7YRN
5618 162 Ave NE
Redmond, WA, 98052-5217

May 27, 1998

ANGELINA ROGINSKI-KC2COR
JOHN MORGANTE-N2GGY
129 PALISADE STREET
DOBBSFERRY, NY 10522

May 23, 1998

OFFICE OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
ROOM 222
1919 M STREET NW
WASHINGTON, DC 20554

I URGE YOU TO CO-SPONSER OR AT LEAST SUPPORT HR 3572, THE AMATEUR RADIO SPECTRUM PROTECTION ACT OF 1998, WHICH HAS BEEN REFERRED TO THE HOUSE COMMERCE COMMITTEE.

IF APPROVED, THE MEASURE WOULD AMEND SECTION 303 OF THE COMMUNICATIONS ACT OF 1934 TO PRECLUDE REALLOCATION OF ANY AMATEUR RADIO ALLOCATIONS UNLESS THE COMMISSION AT THE SAME TIME PROVIDES EQUIVALENT REPLACEMENT SPECTRUM TO THE AMATEUR SERVICE.

THE BILL CITES THAT THE AMATEUR RADIO SERVICE HAS PROVIDED, AND WILL CONTINUE TO PROVIDE, EXCEPTIONAL ASSISTANCE TO THE PUBLIC AGENCIES AND VICTIMS OF DISASTERS, BY PROVIDING EMERGENCY RADIO COMMUNICATIONS FACILITIES DURING AND AFTER THOSE DISASTERS. OUR RADIO FREQUENCIES NEED PROTECTION FROM BEING PURLOINED BY COMMERCIAL INTERESTS.

THANKYOU FOR YOUR CONSIDERATION.

ANGELINA ROGINSKI-KC2COR

JOHN MORGANTE-N2GGY

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RM-9267

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Thomas W. Soulsby, WA4TS
894 Joseph Club Drive
Mableton, GA 30126-1656

FCC

RM-9267
Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, DC 20554

To whom it may concern:

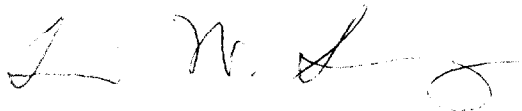
As a licensed Amateur Radio Operator and concerned citizen, I hereby express my opposition to RM-9267, the proposed reallocation of portions of the 420-450 MHz band (70 cm). These bands are now heavily used by radio amateurs, operating in the Amateur Radio Service, for a variety of public service and public interest communications. The 70 cm band plays a critical role in our ability to provide emergency, public service, and public interest communications. I believe that the LMCC proposal is incompatible with continued amateur use of the band.

At a more personal level, the reallocation of these band segments would render useless five (5) items of equipment that I own and utilize whenever I provide emergency and/or public service communications. Of course there are many thousands of other operators in the Amateur Radio Service who will experience similar significant negative impact as the direct result of the proposed reallocation.

These band segments also support control links for operations occurring in other portions of the Amateur Radio Service. As such the proposed reallocation would require an extreme amount of control link re-design and implementation almost certainly resulting in a reduction of the valuable services provided by the Amateur Radio Service. This is unacceptable. These services are essentially free to the public, they're privately funded and supported and their loss could very likely have tragic consequences for a person or persons in need of emergency assistance in the absence of traditional infrastructure during a natural disaster or other unusual situation.

Thank you for considering my comments.

Sincerely yours,



Thomas W. Soulsby

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